

UNITED STATES DISTRICT COURT

for the District of Arizona

United States of America

No.

18-356 MJ

v.

CRIMINAL COMPLAINT

1. Seitaro Kline, and

SEALED

(Under Seal)

2. Carrie Kline

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

Count 1: On or about July 16, 2018, in the District of Arizona, defendant Seitaro Kline, by force, violence, and intimidation, did take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of Alaska USA Federal Credit Union, located within Safeway at 4750 East Indian School Road, Phoenix, Arizona, the deposits of which were then federally insured by the National Credit Union Administration, in violation of Title 18 U.S.C. § 2113(a).

Count 2: On or about July 24, 2018, in the District of Arizona, defendant Carrie Kline, by force, violence, and intimidation, did take from the person and presence of a bank teller, money belonging to and in the care, custody, control, management, and possession of Desert Financial Credit Union, located at 2500 North 44th Street, Phoenix, Arizona, the deposits of which were then federally insured by the National Credit Union Administration, in violation of Title 18 U.S.C. § 2113(a).

I further state that I am a Special Agent from the Federal Bureau of Investigation and that this complaint is based on the following facts:

See Attached Affidavit Incorporated By Reference Herein.

Continued on the attached sheet and made a part hereof: [X] Yes [] No

AUTHORIZED BY: Robert I. Brooks, AUSA

Christopher Maffei
Signature of Complainant

Christopher Maffei, Special Agent - FBI
Printed Name and title

Sworn to before me and signed in my presence.

Date: August 24, 2018

Michelle H. Burns
Judge's Signature

City and State: Phoenix, Arizona

Hon. Michelle H. Burns, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Christopher Maffei, a Special Agent with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) in Phoenix, Arizona. I have been appointed a Special Agent with the FBI since June of 2015. In that time, I have authored and served multiple search warrants related to bank robbery, violations of the Hobbs Act (commercial robbery), drug trafficking, and fraud.

2. I am investigating the criminal activities conducted through a search of the listed locations. As shown below, there is probable cause to believe that individuals utilizing and or residing in the above listed residence committed numerous bank robberies, in violation of Title 18 USC § 2113.

3. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. In November of 2016, the FBI began investigating a series of ongoing bank robberies. Investigators believe that the same individuals engaged in at least twelve robberies of various banks between November 5, 2016 and July 24, 2018. Each robbery is listed and described below. Each bank is federally insured by the Federal Deposit Insurance Corporation.

5. Robbery 1: On November 5, 2016, at approximately 11:46 a.m., a white female robber entered the TCF Bank located at 11 S. McClintock Drive, Tempe, Arizona. After entering, the robber stood in the bank until being called up by the victim teller. The suspect then approached the victim teller and stated "this is a robbery, don't trigger any alarms, give me the money." The victim teller complied with the demands and removed currency from their cash drawer, along with bait bills and a GPS tracking device. The victim placed the money on the teller counter, and the suspect picked it up without touching the counter. The suspect then ran out of the bank and fled in an unknown direction. Shortly afterwards, the GPS device stopped transmitting and was never located. The robber was described as being 25-35 years old, 5'5" to 5'6" in height and 100 pounds, wearing a black baseball hat with a yellow bill, a black short sleeved t-shirt over a gray hooded sweatshirt, blue jeans, and black tennis shoes with white soles. All of the clothing was baggie and over-sized. The robber was able to obtain \$1,155.00 during the course of the robbery. This incident was documented under FBI case number 91A-PX-2099751.



6. Robbery 2: On November 25, 2016, at approximately 12:20 p.m., a Hispanic male robber entered the TCF Bank located at 11 S. McClintock Drive, Tempe, Arizona. Upon entering the bank, the suspect approached the teller counter, covered his hands and fingers, and verbally demanded money. The robber stated "This is a robbery, be quick, give me all the big bills, no funny money" and the victim teller complied. After receiving currency, the robber demanded bigger bills and the victim teller complied. Once being handed all of the money, the suspect looked through the currency before fleeing the bank. The robber was described as approximately 30-35 years old, 5'8" to 5'10" in height and 180 pounds, dark hair and a mustache, wearing a long sleeve plaid shirt, dark pants, dark boots, and a black baseball hat. The robber was able to obtain \$2280.00 during the course of the robbery. This incident was documented under FBI case number 91A-PX-2105112.



7. Robbery 3: On July 28, 2017 at approximately 4:49 p.m., a white female robber entered the BBVA Compass, located at 20016 North 67th Avenue, Glendale, AZ. Upon entering, the robber approached the victim teller and stated "this is a robbery, without pressing buttons, give me the money." The victim teller complied with the demand and provided money. The robber was described as a white female, 25 years old, 5'2" and 105

pounds with a skinny build, wearing a black ski cap, black sunglasses, a baggy black jacket, and baggy black pants. The robber was able to obtain \$510.00 during the course of the robbery. This incident was documented under FBI case number 91A-PX-2193428.



8. Robbery 4: On August 2, 2017 at approximately 6:40 p.m. a light skinned black male robber entered the MidFirst Bank #8236 located at 702 East Thunderbird Road, Phoenix, Arizona. Upon entering, the robber approached the victim teller, and stated “this is a robbery, hurry up and give me the money.” The victim teller complied with the demand and provided the robber with money. The robber then fled from the bank towards the drive-through area where he entered the passenger side of a newer model, white in color, four door sedan. The robber was described as being 30-40 years old, 5’10” to 6’0”, 180-210 pounds, wearing a black baseball hat with white and red designs / logos on the front and sides, dark sunglasses with a silver wire frame, a gray suit, a black t-shirt underneath, and black shoes. The robber also appeared to be limping on his right leg. The robber was able to obtain \$1,312.00 during the course of the robbery. This incident was documented under FBI case number 91A-PX-2194381.



9. Robbery 5: On August 11, 2017 at approximately 3:16 p.m. a white female robber entered the TCF Bank located at 11 South McClintock Drive, Tempe, Arizona. Upon entering, the robber approached the victim teller and verbally demanded money by stating “don’t give me any funny money or bait money.” The victim teller complied with the demands and removed currency from her cash drawer, along with a GPS tracking device. The victim handed the money to the suspect, who then exited the bank. The GPS tracking device was located by passer-by less than 200 feet from the bank. The robber was described as being 28-35 years old, 5’8”, 125-135 pounds, wearing a red baseball hat, black sun glasses, black gloves, a blue suit with a white dress shirt underneath, a black shirt underneath the dress shirt, and black shoes. All of the clothing appeared to be oversized and baggie. The robber was able to obtain \$630.00 during the course of the robbery. This incident was documented under FBI case number 91A-PX-2198960.



10. Robbery 6: On September 2, 2017 at approximately 9:14 a.m., a Hispanic male robber entered the Safeway supermarket located at 20205 North 67th Avenue, Glendale, Arizona and walked directly to the Wells Fargo Bank located inside. The robber waited in line until the teller was available, approached the victim teller, and verbally demanded money by saying "this is a fucking robbery, give me all the money." The teller complied with the demands and provided the robber with money. The robber took the currency and fled the bank. The robber was described as being in his 30's, approximately 5'10" and 180-185 pounds, with a light beard and wearing a short sleeve tan shirt, black hat, sunglasses, and dark pants. The robber was able to obtain \$1015.00 during the course of the robbery. Two separate witnesses outside described the vehicle as a blue or silver Nissan Juke. The first witness described the vehicle as being parked near the north doors of the supermarket, and the license plate being covered by an unknown female. The second witness advised he observed the vehicle traveling at a high rate of speed out of the parking lot. The second witness identified the license plate and an Arizona license plate with the first letter being "A". This incident was documented under FBI case number 91A-PX-2205855.



11. Robbery 7: On September 21, 2017 at approximately 4:05 p.m., a white female robber entered the Parkway Bank located at 4731 East Union Hills Drive, Phoenix, Arizona. Upon entering, the robber approached the victim teller and stated “this is a robbery, don’t give me your funny money, don’t set off the alarm.” The victim teller froze at which time the robber stated “yes, this is for real” and the victim teller complied with the demand providing the robber with money and a GPS tacking device. The robber exited the bank and entered the passenger side of a waiting Nissan Juke, silver in color. The disabled GPS device was found nearby. The robber was described as being in her 30’s, approximately 5’0” to 5’4” with a thin build, dark hair, and wearing black sunglasses, a dark hooded sweatshirt, dark pants, and black shoes with white soles. The clothing appeared to be baggie and oversized. The robber was able to obtain \$1,400.00 during the course of this robbery. This incident was documented under FBI case number 91A-PX-2212425.



12. Robbery 8: On September 30, 2017 at approximately 6:50 p.m., a Hispanic male robber entered the Safeway Grocery Store and approached the Alaska Federal Credit

Union, located at 10641 West Olive Avenue, Peoria, Arizona 85345. Once at the credit union, the robbery addressed the victim teller and stated “this is a robbery, just give me the money, no funny business.” At this time, the robber manipulated the front of his shirt, giving the victim teller the impression that he was armed. The victim teller complied with the robber’s demands and provided money. The robbery then said “thank you” and fled the scene. The robber was described as a Hispanic male, 30-40 years old, 5’5” in height, 195 pounds, wearing a black and white long sleeve plaid shirt, large black sunglasses, a green baseball hat, dark pants, and white shoes. The robber was able to obtain \$967.00 during the course of this robbery. This incident was documented under FBI case number 91A-PX-2215069.



13. Robbery 9: On June 19, 2018 at approximately 5:52 p.m., an unknown white female suspect entered the TCF Bank located at 11 South McClintock Drive in Tempe, Arizona. Upon entering the bank, the suspect was directed to a teller window by a bank teller. At the teller window, the suspect presented a demand note stating “this is a robbery” in all capital letters. The teller complied and provided the suspect with a known amount of currency, along with bait bills attached to a GPS tracking device. The suspect kept the note

and exited the bank with \$176.00 in U.S. currency. The GPS device and bait bills were recovered nearby. The suspect was described as a white female who is approximately 5'06"-5'07" tall, with a thin build, mid to late 20s, and wearing a dark-colored long sleeve shirt, dark-colored pants, an off-white, wide-brimmed fisherman style hat, and dark sunglasses. This incident was documented under FBI case number 91A-PX-2943492.



14. Robbery 10: On June 25, 2018 at approximately 3:28 p.m., an unknown Hispanic male entered the Alaska USA Federal Credit Union located inside the Safeway grocery store at 4750 East Indian School Road, Phoenix, Arizona. The suspect entered the bank, stepped up to the victim teller's station, leaned over the counter top and said something to the effect of, "This is a robbery, give me all your cash!" The victim teller complied with the demands and began to remove money from his cash drawer. The victim also noticed the suspect had one hand under his shirt to imply he was armed with a weapon. The victim then handed \$1939.00 to the suspect who fled the bank on foot. The suspect was described as 35 years old, 5'09"-5'10", 220-225 lbs, medium complexion, unshaven, "thuggish" voice, wearing a black or dark blue Arizona Diamondbacks baseball cap over a white towel on his head, black plastic sunglasses, blue long sleeve button down shirt,

black Dickies type pants, white glove on one hand. This incident was documented under FBI case number 91A-PX-2945932.



15. Robbery 11: On July 16, 2018, at approximately 4:41 p.m., a Hispanic male suspect entered the Alaska USA Federal Credit Union located within a Safeway at 4750 East Indian School Road, Phoenix, AZ 85018. The suspect entered the Safeway and approached the teller station and verbally demanded the money. The suspect continued to demand more money and requested no "funny money". Suspect obtained a \$1,486.00 of U.S. currency and fled on foot westbound. The suspect is an unidentified Hispanic male who is 5'07"-5'10" tall, late 30s, stocky build, unshaven and wearing a white polo shirt with stripes, long blue shorts, black tennis shoes, white Puma baseball hat with blue on the front and an outline of a puma and large sunglasses. This incident was documented under FBI case number 91A-PX-2957091.



16. Robbery 12: On July 24, 2018 at approximately 3:26 p.m., an unknown white female entered the Desert Financial Credit Union located at 2500 N. 44th Street, Phoenix, Arizona. The suspect entered the bank and waited in line posing as a customer. The suspect approached the teller station when called and pressed a handwritten demand note against the bullet proof glass. The noted stated that it was a robbery, do not touch the button and give me all the cash. The teller complied and gave the suspect \$1,015 of U.S. currency and fled on foot southbound. The suspect is an unidentified white female who is 5'0"-5'2" tall, 110-115 lbs., 30-40 years old, black sandals, tan fisherman hat, scarf with red print, large black sunglasses with round lenses and very dark facial make-up. This incident was documented under FBI case number 91A-PX-2960883.



17. The total loss attributed to these robberies is currently \$12,870.

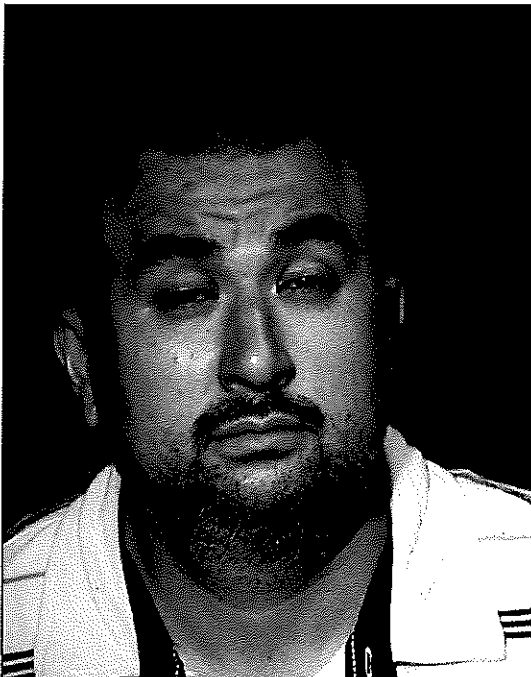
INVESTIGATION

18. During Robbery 11, investigators were able to observe the male suspect's tattoos for the first time, due to him wearing a short sleeve polo shirt. Investigators began researching the tattoo in law enforcement databases. On July 29, 2018, I received an investigative lead from Sgt. Krueger with the Gilbert Police Department. That lead indicated that SEITARO KLINE and CARRIE KLINE may be the suspects responsible for this robbery series. This lead was based on the facial characteristics of both suspects and

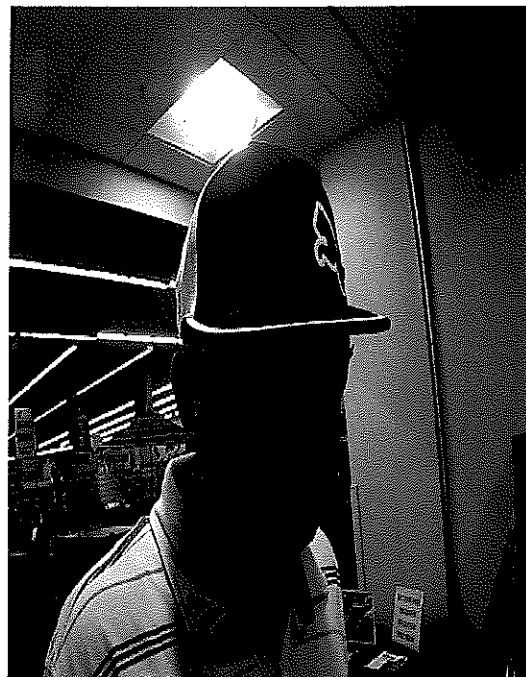
the tattoos on the right arm of SEITARO KLINE, which were documented in a previous arrest.

19. When comparing the facial characteristics of SEITARO KLINE to that of the male suspect, he was found to have similar characteristics. Specifically the mouth shape, facial hair patterns, nose, and ears. Additionally, SEITARO KLINE was arrested on July 13, 2018. In his booking photograph, he appeared to be wearing a similar colored and style shirt as the robber wore in robbery #11, which occurred on July 16, 2018.

Booking Photograph



Robbery Photograph





Robbery Photograph (Tattoo)

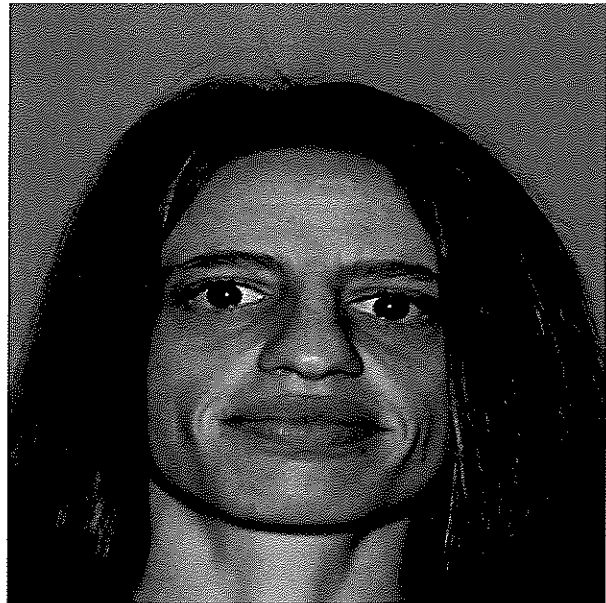


SEITARO KLINE Tattoo

20. When comparing the facial characteristics of the female suspect and CARRIE KLINE, similarities were found. Specifically the nose, lips, and ears.



Robbery 9 Surveillance video



Driver's License Photograph

21. On July 13, 2018, SEITARO KLINE and CARRIE KLINE were contacted by the Phoenix Police Department (2018-00001229300). During that contact, SEITARO KLINE was arrested for possession of cocaine. Due to SEITARO KLINE's suspended

license, the vehicle that they were driving in was impounded on a thirty day hold pursuant to Arizona law. The vehicle, a primer gray 2000 Chevrolet Cavalier bearing Arizona license plate BAG8931 and V.I.N. 1G1JC5241Y7258886 was towed to the Desert Valley tow yard located at 23811 North 7th Avenue in Phoenix, Arizona. SA Maffei became aware of this on July 30, 2018 and learned that the KLINES have been previously documented as living out of their vehicles. On July 31, 2018, SA Maffei and TFO Barrett responded to that location to confirm the vehicle's presence. Additionally, numerous items of clothing were visible within the vehicle. At the time, SA Maffei and TFO Barrett made arrangements for that vehicle to be transported to the FBI so that a search warrant could be served on the vehicle for any items of clothing that were related to this robbery series. On August 1, 2018, a search warrant was signed by the Honorable Judge Utiki Lang of the Maricopa County Superior Court.

22. During the search of the vehicle, multiple items of identification for both CARRIE KLINE and SEITARO KLINE were located. In addition, a tan hat was located that appeared similar to the style hat worn in robbery 12 by CARRIE KLINE and a blue belt worn by SEITARO KLINE in robbery 11. Multiple pairs of binoculars were located along with an item indicative of shoplifting clothing that could indicate a method of obtaining robbery clothing.

23. Additional research into pawn transactions revealed surveillance photographs taken while the items were being pawned. During some of those transactions, both CARRIE KLINE and SEITARO KLINE could be seen pawning the items together.

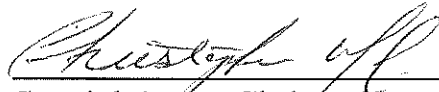
24. During the course of this investigation, photographic line-ups were shown to the victims and witnesses who were involved in these robberies. Regarding CARRIE KLINE, the victim teller from robbery 7 (M.R.) positively identified CARRIE KLINE as the female who committed the bank robbery. Additionally, the victim teller (S.R.) and witness (V.C.) from robbery 12 positively identified CARRIE KLINE as the female who committed that robbery. Regarding SEITARO KLINE, the victim teller from robbery 6 (R.D.) positively identified SEITARO KLINE as the male who committed the robbery.

The victim teller (J.O.) from robbery 10 who was also a witnesses in robbery 11 also positively identified SEITARO KLINE and the male who committed both of those robberies.

AUTHORIZATION REQUEST

25. Based on the foregoing, I have reason to believe there is probable cause to arrest SEITARO KLINE and CARRIE KLINE for violations of Title 18, United States Code, Section 2113(a) and request that an arrest warrant be issued for SEITARO KLINE and CARRIE KLINE.

I declare under penalty of perjury under the laws of the United States of America that the forgoing is true and correct.



Special Agent Christopher Maffei
Federal Bureau of Investigation

Subscribed and sworn before me this 24 day of August, 2018.



HONORABLE MICHELLE H. BURNS
United States Magistrate Judge
District of Arizona